

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE:	§	
	§	
DEEP MARINE HOLDINGS, INC.,	§	CASE NO. 09-39323-H1-11
et. al.	§	(Jointly Administered)
	§	
Debtors.	§	CHAPTER 11
	§	
	§	

DEEP MARINE 1, LLC	§	ADVERSARY NO. 10-03271
	§	
Plaintiff,	§	
	§	
THE DEEP MARINE LIQUIDATING	§	
TRUST (AS SUCCESSOR TO DEEP	§	
MARINE TECHNOLOGY	§	
INCORPORATED, DEEP MARINE	§	
HOLDINGS, INC., DEEP MARINE 1, LLC;	§	
DEEP MARINE 2, LLC, DEEP MARINE 3,	§	
LLC, AND DEEP MARINE 4, LLC);	§	
GENERAL ELECTRIC CAPITAL	§	
CORPORATION; NOBLE DENTON	§	
MARINE, INC.; BNA MARINE SERVICES,	§	
LLC; OTTO CANDIES, LLC; B&J	§	
MARTIN, INC.; NREC POWER SYSTEMS,	§	
INC.; CAPROCK COMMUNICATIONS,	§	
INC.; BOLLINGER SHIPYARDS TEXAS	§	
CITY, LP; BOLLINGER FOURCHON,	§	
LLC; ARAMARK US OFFSHORE	§	
SERVICES, LLC; AND CROSSMAR, INC.	§	
	§	
Defendants.	§	

DEFENDANT CAPROCK COMMUNICATIONS, INC.'S REPLY TO CROSS-CLAIM
FILED BY ARAMARK CORPORATION

[RELATED TO DOCKET NO. 34]

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Defendant CAPROCK COMMUNICATIONS, INC. ("Caprock") files this Reply to the Cross-Claim filed by Aramark US Offshore Services, LLC's ("Aramark") (the "Cross-claim"), and respectfully would should this Court the following:

1. Caprock admits the factual allegations contained within Paragraph 1 of the Cross-claim.
2. Caprock presently lacks information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 2 of the Cross-claim.
3. Paragraph 3 of the Cross-claim re-alleges by reference the factual allegations previously set forth in the Cross-claim. Caprock likewise incorporates by reference its responses to the factual allegations contained above.
4. Caprock presently lacks information or knowledge sufficient to form a belief as to the truth of the allegations contained in Paragraph 2 of the Cross-claim.
5. Caprock admits the factual allegations contained within Paragraph 1 of the Cross-claim.

WHEREFORE, PREMISES CONSIDERED, Caprock Communications, Inc., one of the Defendants in the above numbered and styled cause, prays that (i) the Court determine the validity priority and amount of Caprock's lien on the proceeds; (ii) enter judgment in accordance therewith requiring the proceeds to be distributed; and (iii) granting such other and further relief as is just and proper.

Respectfully submitted,

HOOVER SLOVACEK LLP

By: /s/ Edward L. Rothberg

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ATTORNEYS FOR DEFENDANT,
CAPROCK COMMUNICATIONS, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Defendant, Caprock Communications, Inc.'s Reply to Aramark's Cross-claim was served on August 27, 2010 by the United States Bankruptcy Court's electronic noticing system and by first class mail to counsel for General Electric Capital Corporation:

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/s/ Edward L. Rothberg
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